## Pepper Hamilton LLP Attorneys at Law

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January 20, 2006

## Via Electronic File

The Honorable Kent A. Jordan U.S. District Court for the District of Delaware 844 N. King Street Lock Box 44 Wilmington, DE 19801

Re: Ashley T. Adams v. Integrity Staffing, et al.,

Civil Action No. 05-249-KAJ

Dear Judge Jordan:

We represent Integrity Staffing Solutions, Inc. ("Integrity"), Dawn Harper-Smith, J.P. Morgan Chase ("Chase") and Cheryl Denneny in the above-captioned case, and we write because our correspondence to the plaintiff, Ashley Adams, who appears <u>pro</u> <u>se</u>, goes unanswered.

By way of background, this is an employment discrimination case where Adams' former employer, Integrity, and Integrity's client, Chase, (whom Adams presumably alleges is a joint employer), answered the complaint. Integrity and Chase employees, Dawn Harper-Smith and Cheryl Denneny, both filed motions to dismiss under Fed. R. Civ. P. 12(b)(6), asserting that Title VII does not allow for individual liability. The motions are fully briefed, and we await the Court's disposition of the motions.

With respect to discovery on the claims against Integrity and Chase, we have been attempting to start the discovery process and meet our Fed. R. Civ. P. 16 obligations, but the correspondence that we have sent to Ms. Adams by certified mail has been returned to us as "unclaimed." The inability to communicate with Ms. Adams is impeding our ability to conduct discovery, and we therefore seek the Court's intervention in obtaining a means of communicating with Ms. Adams.

Respectfully submitted,

Sean P. McDevitt

SPM/jas

cc: Clerk of the Court (By Electronic File)

Ashley T. Adams (By First-Class Mail and Certified Mail)

 Philadelphia
 Washington, D.C.
 Detroit
 New York
 Pittsburgh

 Berwyn
 Harrisburg
 Orange County
 Princeton
 Wilmington